

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KALEB COLE,

Defendant.

No. CR20-032 JCC

DEFENDANT'S OBJECTIONS TO
GOVERNMENT'S PROPOSED SOUND
CLIP EXHIBITS

Defendant, Kaleb Cole, by undersigned counsel, respectfully submits the following objections to a number of the government's proposed sound clips (as set forth below). Counsel will raise objections during the course of trial but submits these written objections as well as the transcripts corresponding to the government's proposed exhibits (filed under seal) in order to hopefully expedite the Court's consideration of, and ruling on, the objections.

Objections

The defense objects to the introduction of the portion of **Government Exhibit 201** occurring prior to page 4, line 7 of the corresponding transcript on the basis that the statements are irrelevant to the charges and highly prejudicial to Mr. Cole, as they involve a discussion of the possession of firearms.

1 The defense objects to the introduction of the portion of **Government Exhibit 202**
2 occurring prior to page 3, line 5 of the corresponding transcript on the basis that the statements
3 are irrelevant to the charges and highly prejudicial to Mr. Cole, as they involve a discussion of
4 the possession of firearms.

5 The defense objects to the introduction of the portion of **Government Exhibit 606**
6 occurring after page 2, line 10 of the corresponding transcript on the basis that the statements are
7 irrelevant to the charges and highly prejudicial to Mr. Cole, as they involve a discussion of him
8 being in jail.

9 The defense objects to the introduction of the portions of **Government Exhibit 607**
10 occurring prior to page 10, line 10, and after page 11, line 18, of the corresponding transcript on
11 the basis that the statements are irrelevant to the charges and highly prejudicial to Mr. Cole, as
12 they involve a discussion of him being in jail and being deported from Canada.

13 The defense objects to the introduction of **Government Exhibit 701** in its entirety as it
14 relates to statements allegedly made by Mr. Cole more than a year prior to the activities
15 underlying the charges in this matter and therefore creates a danger of prejudice and of confusing
16 the jury.
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Respectfully submitted this 26th day of September, 2021.

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